

Magan Chinnery
SBOT No.: 24108571
Graham Legal, PLLC
8501 Wade Blvd.
Suite 340
Frisco, Texas 75034
214.618.1700 Phone
214.291.5436 Fax

ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE: §
§
WILLIE JAMES TRAYLOR, JR. § CASE NO. 24-33514
§
§
DEBTOR §

MOTION TO EXTEND TIME TO FILE SCHEDULES,
STATEMENTS AND OTHER REQUIRED DOCUMENTS

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW Debtor, Willie James Traylor, Jr. (the “Debtor”), and requests an order extending the deadline to file his schedules, statements and other required documents, and would respectfully show the Court as follows:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28 U.S.C. §1334.
2. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b).
3. Debtor filed a petition under Chapter 7 of the Bankruptcy Code on November 1, 2024.
4. Debtor’s schedules, statements and other required documents are due on November 15, 2024.

MOTION TO EXTEND TIME TO FILE SCHEDULES, STATEMENTS AND OTHER REQUIRED DOCUMENTS - Page 1 of 3

5. Debtor has been unable to obtain the necessary information needed to accurately complete his required documents.

6. Debtor requests an additional ten days, until November 25, 2024, in order to file all the necessary documents as required by law.

7. Debtor is not making this request to hinder or delay his creditors or any other party in interest.

WHEREFORE, PREMISES CONSIDERED, Debtor prays for an order of this Court extending the deadline to file his schedules, declaration about an individual debtor's schedules, summary of assets and liabilities and certain statistical information, statement of financial affairs, statement of income/means test, statement of intent, and employee income records to November 25, 2024, and for such other and further relief to which he may be entitled.

Respectfully submitted,

/s/ Magan Chinnery
Magan Chinnery
SBOT NO: 24108571
Graham Legal, PLLC
8501 Wade Blvd. Ste. 340
Frisco, Texas 75034
214.618.1700 Phone
214.291.5436 Fax
magan@grahamlegalpllc.com

ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 13, 2024, a true and correct copy of the foregoing was served on all parties in interest below by first class mail or electronic notice.

/s/ Magan Chinnery
Magan Chinnery

DEBTOR

Willie James Traylor, Jr.
1320 Pennsylvania Ave. Apt. 204
Dallas, TX 75215

CHAPTER 7 TRUSTEE

Robert Yaquinto, Jr.
509 N. Montclair
Dallas, TX 75208

OFFICE OF THE U.S. TRUSTEE
1100 Commerce Street
Room 976
Dallas, TX 75242

Attn: Capital One Auto Finance, a division of Capital One, N.A. Department
AIS Portfolio Services, LLC
Account: XXXXXXXXX1941
4515 N. Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118